

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

IN RE GENWORTH FINANCIAL, INC.,  
SECURITIES LITIGATION

Civ. A. No. 3:14-cv-00682-JAG

Hon. John A. Gibney, Jr.

**CLASS ACTION**

**NOTICE OF FILING MEMORANDUM OF LAW  
AND EXHIBITS UNDER SEAL**

Lead Plaintiffs Fresno County Employees' Retirement Association and Her Majesty the Queen in Right of Alberta ("Lead Plaintiffs"), by and through their undersigned counsel of record, hereby give Notice of filing under seal Lead Plaintiffs' Reply Memorandum Of Law And Exhibits in further support of Their Motion To Compel Production Of Documents And Opposing Defendants' Request To "Clawback" Non-Privileged Documents. This filing is being made pursuant to the Stipulated Protective Order entered June 25, 2015 (ECF No. 85).

A motion to seal these documents will be filed shortly.

DATED: November 19, 2015

/s/ Susan R. Podolsky \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 19, 2015, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

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